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Counsel for Lead Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ETIENNE BALON, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

vs.

AGRIA CORPORATION, GUANGLIN
LAI, XIE TAO, JOHN FULTON, and
WAH KWONG TSANG,

Defendants.

No.: 2:16-cv-08376-SDW-LDW

CLASS ACTION

**NOTICE OF MOTION AND
MOTION FOR ENTRY OF ORDER
PRELIMINARILY APPROVING
SETTLEMENT AND
ESTABLISHING NOTICE
PROCEDURES**

Motion Day: August 7, 2017

Hon. Susan D. Wigenton

PLEASE TAKE NOTICE that on August 7, 2017, Lead Plaintiffs Etienne Balon and Xiao Ming Zhou (“Plaintiffs”) will move this Court, the Honorable Susan D. Wigenton, United States District Judge of the United States District Court for the District of New Jersey, 50 Walnut Street, Courtroom 5C, for entry of an Order: (i) preliminarily approving the settlement between Plaintiffs and Defendant Agria Corporation (“Agria”); (ii) conditionally certifying the Settlement Class; (iii) approving the notice to the Class of the Proposed Settlement; and (iv) scheduling a final approval hearing for a date at the Court’s convenience.

In support of this motion, Plaintiffs rely on the accompanying Memorandum of Law, the Stipulation of Settlement and Exhibits thereto, the pleadings and records on file in this action, and other such matters as the Court may consider at the hearing on this motion.

Defendant Agria does not oppose this motion.

Dated: June 30, 2017

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Laurence Rosen

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of June, 2017 a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence Rosen
Laurence Rosen